

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
SPRING VALLEY BRANCH; JULIO
CLERVEAUX; CHEVON DOS REIS; ERIC
GOODWIN; JOSE VITELIO GREGORIO;
DOROTHY MILLER; HILLARY MOREAU;
and WASHINGTON SANCHEZ,

Plaintiffs,

v.

EAST RAMAPO CENTRAL SCHOOL
DISTRICT and MARYELLEN ELIA, IN HER
CAPACITY AS THE COMMISSIONER OF
EDUCATION OF THE STATE OF NEW
YORK,

Defendants.

17 Civ. 8943 (CS) (JCM)

DECLARATION OF CLAUDIA T. SALOMON

CLAUDIA T. SALOMON, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am a Partner at the law firm of Latham & Watkins LLP, 885 Third Avenue, New York, NY 10022, co-counsel for Plaintiffs with the New York Civil Liberties Union Foundation in the above-captioned matter. I am a member in good standing of the bar of the State of New York and this Court.

2. I respectfully submit this Declaration in support of Plaintiffs' Opposition to the Defendant East Ramapo Central School District's (the "District") Emergency Motion to Stay Decision and Order Pending Appeal. I am familiar with all of the facts and circumstances set forth herein.

3. Attached as Exhibit 1 is a true and correct copy of the document Board Policy 2351 -- Quorum, downloaded from <https://www.ercsd.org/site/handlers/filedownload.ashx?moduleinstanceid=53&dataid=624&FileName=2351---Quorum.pdf>.

4. Attached as Exhibit 2 is a true and correct copy of excerpts of the trial transcripts for February 27, 2020 and March 24, 2020.

Dated: May 30, 2020
New York, New York

/s/ Claudia T. Salomon
Claudia T. Salomon